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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO AMERICAN POSTAL WORKERS UNION INTERROGATORIES (APWU/USPS-21 and 22)

The United States Postal Service hereby files its institutional responses to the above-identified interrogatories of the American Postal Workers Union, dated March 29, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE TO AMERICAN POSTAL WORKERS UNION INTERROGATORY

APWU/USPS-21 In response to APWU/USPS-T1-34 Mr. Williams stated that "the Postal Service is currently evaluating new service areas and assessing any potential changes required for Express Mail and Priority Mail service standards."

- a) Please provide the current performance data for Priority Mail and Express Mail.
- b) Once the evaluation referenced in Mr. Williams' response is complete, please provide the list of changed 3-digit Zip Code pairs for Priority Mail and Express Mail.

RESPONSE:

- a) The Postal Service has filed an objection to this subpart.
- b) The evaluation referenced in Mr. Williams' response is still ongoing, and is contingent upon the final determination and implementation of the network changes. The Postal Service will provide the list of 3-digit ZIP Code pairs for Priority Mail and Express Mail once the evaluation is complete.

INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE TO AMERICAN POSTAL WORKERS UNION INTERROGATORY

APWU/USPS-22 Does the Postal Service measure the volume of "turnaround" Priority Mail?

- a) What is the current percentage of Priority Mail that currently receives overnight delivery?
- b) What percentage of Priority Mail that currently receives overnight delivery will shift to 2-day delivery in the new rationalized network?

RESPONSE:

Preamble) No.

- a) Currently, 1.1% of origin-destination 3-digit ZIP Code pairs have an overnight
 Priority Mail service standard. Further, see the response to APWU/USPS-T1—
 34. The Postal Service is not required to report Express Mail or Priority Mail performance.
- b) See the response to APWU/USPS-T1—34. Even when the Postal Service completes realignment of ZIP Code pair service standards as referenced in response to APWU/USPS-21(b), the Postal Service will still be unable to predict the percentage of Priority Mail that will be delivered within its applicable service standard in the future.